## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

1)	VIDEO GAMING TECHNOLOGIES, INC.,	)	
	Plaintiff,	)	
v.		)	Case No. 4:17-cv-00454-GKF-JFJ
1)	CASTLE HILL STUDIOS LLC	)	
2)	(d/b/a CASTLE HILL GAMING); CASTLE HILL HOLDING LLC	)	
3)	(d/b/a CASTLE HILL GAMING); and IRONWORKS DEVELOPMENT, LLC	)	
	(d/b/a CASTLE HILL GAMING)	)	
	Defendants.	)	

## DECLARATION OF GARY M. RUBMAN IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION IN LIMINE TO LIMIT THE TESTIMONY OF PLAINTIFF'S DAMAGES EXPERT MELISSA A. BENNIS

- 1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. ("VGT"). I was admitted *pro hac vice* in this case on August 9, 2017.
- 2. Attached as **Exhibit G** is a true and correct copy of the *curriculum vitae* ("CV") of Melissa A. Bennis.
- 3. Attached as **Exhibit H** is a true and correct copy of excerpts from the transcript of the deposition of Melissa Bennis, taken on September 26, 2018.
- 4. Attached as **Exhibit I** is a true and correct copy of excerpts from the transcript of the deposition of Arthur A. Watson III, taken on July 12, 2018.

- 5. Attached as **Exhibit J** is a true and correct copy of an email from Alan Roireau to Arthur Watson, sent on January 26, 2016. This constitutes Bates numbers CHG0023236–37.
- 6. Attached as **Exhibit K** is a true and correct copy of a document titled "CHG Class II Bingo System." This constitutes Bates numbers CHG000872–73.
- 7. Attached as **Exhibit L** is a true and correct copy of excerpts from the transcript of the deposition of Alan R. Roireau, taken on May 15, 2018.
- 8. Attached as **Exhibit M** is a true and correct copy of the *curriculum vitae* ("CV") of W. Todd Schoettelkotte..
- 9. Attached as **Exhibit N** is a true and correct copy of excerpts from the transcript of the deposition of W. Todd Schoettelkotte, taken on September 22, 2018.
  - 10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2018 in Washington, D.C.

Gary M. Rubman

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2018, I filed an unredacted copy of the foregoing

via ECF, which caused service to be effected on the following counsel for Defendants:

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/s/ Gary M. Rubman